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**Re: In Re The Application Drey Moor Fertilizers Pte Ltd.**  
**Case No. 1:20-mc-00192(PGG)**

Dear Justice Gardephe:

We write in response to a phone call we received from your chambers asking about the status of the above referenced matter which is a 28 U.S.C. § 1782 application for limited discovery, originally filed *ex parte* on September 3, 2020, with a further update letter filed on January 19, 2021. That application was simply a supplement to the previous application filed on April 14, 2020, which was granted by order of this Court on May 18, 2020. The Court has not yet issued an order on the pending application.

The discovery requested remains needed for the reasons stated in the application. In summary, the pending supplemental application seeks to extend the scope of the documents sought, on the same basis as the previous application. The discovery previously obtained appeared to show at least one large payment made in early 2017 by the sole owner and shareholder of and/or her entities to an entity controlled by an individual affiliated with applicant, and there appears to be no proper basis for this payment. The discovery sought here will expand the scope of the discovery to include any similar apparently improper payments and will be of use in various ongoing or anticipated foreign proceedings, including in Lithuania and Ukraine.

Granting the application would foster the twin goals of § 1782, namely “providing efficient means of assistance to participants in international litigation in our federal courts and encouraging foreign countries by example to provide similar means of assistance to our courts.” *In re Accent Delight International Ltd.*, 869 F.3d 121, 134 (2d Cir. 2017).

We respectfully request that the Court grant the pending application as soon as feasible.

Respectfully,



Patrick Salisbury

PPS:bjs